

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

JOHN FORREST
KATHRYN M. FORREST,

Plaintiffs,

v.

WELLS FARGO BANK, AS TRUSTEE FOR
OPTION ONE MORTGAGE LOAN TRUST
2007-2, ASSET BACKED CERTIFICATES,
SERIES 2007-2, ALIAS; SAND CANYON
CORPORATION, ALIAS, AND AMERICAN
HOME MORTGAGE SERVICING, INC.,
ALIAS,

Defendants.

CIVIL ACTION NO.:1:11-cv-00306-S

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

The defendants, Wells Fargo Bank, as Trustee for Option One Mortgage Loan Trust 2007-2, Asset Backed Certificates, Series 2007-2 (“Wells Fargo”), and American Home Mortgage Servicing, Inc. (“AHMSI”), (collectively, “Defendants”), hereby move for a 30 day extension of time to respond to the Complaint, until August 30, 2011. As grounds for the motion, the Defendants state:

1. On July 25, 2011, the Defendants filed a Notice of Removal causing this case to be removed from the Providence Superior Court. Pursuant to F.R.C.P. 81, the Defendants are required to file a response to the Complaint on or before August 1, 2011, which is seven days from the date of removal.

2. Defense counsel requires additional time to review the numerous allegations in the Complaint with their clients to determine how to respond. Attorney Bodurtha is Court-excused from August 1 through August 12, 2011. Attorney McKelvey, while not presently Court-excused, has been out of the office from July 20 through July 28, 2011.

3. There is no prejudice to the Plaintiffs in granting the extension. Plaintiffs' counsel has informed defense counsel that he will not oppose this motion requesting additional time to respond to the complaint. Judicial economy will be served by granting the extension.

WHEREFORE, the Defendants request that the time within which to file a responsive pleading be extended up to and including August 30, 2011.

WELLS FARGO BANK, AS TRUSTEE FOR
OPTION ONE MORTGAGE LOAN TRUST 2007-
2, ASSET BACKED CERTIFICATES, SERIES
2007-2, ALIAS; and AMERICAN HOME
MORTGAGE SERVICING, INC., ALIAS,

By Their Attorneys,

/s/ Samuel C. Bodurtha

Maura K. McKelvey, #6770

Samuel C. Bodurtha, #7075

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401-751-0842

401-273-8543 (facsimile)

Dated: July 28, 2011

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants, if any, on July 28, 2011.

/s/ Samuel C. Bodurtha